

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. No. 05-10490 NMG

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NANCY BUCKLEY, )  
Plaintiff )  
                )  
v.              )  
                )  
CITY OF BROCKTON )  
SCHOOL DEPARTMENT, )  
Defendant )  
                )  
\_\_\_\_\_)

PLAINTIFF'S PRE-TRIAL WITNESS AND EXHIBIT LIST  
PURSUANT TO FED R. Civ. P. 26(a)(3)

WITNESSES

1. Nancy Buckley  
138 Falconer Avenue  
Brockton, MA 02301  
508-586-7217
2. Joseph Bage  
221 Oak Street  
Brockton, MA 02301
3. Robert Uto  
222 Myrtle Street  
Brockton, MA 02301  
508-580-7463-work  
508-583-0693 - home
4. MaryBeth McManus  
97 Boylston Street  
Brockton, MA 02301  
508-580-4366 - work  
508-587-1298 - home

5. Joseph Whiton  
47 Gretter Road  
Roslindale, MA 02131  
508-580-7411 - work  
617-327-2529 - home
6. Kathleen Sirois  
71 Carroll Avenue  
Brockton, MA 02301  
508-580-7535 - work  
508-584-4178 - home
7. Susan Szachowicz  
36 Tucker Drive  
Brockton, MA 02301  
508-580-7633 - work
8. Michelle Finnegan  
55 Quail Street  
W. Roxbury, MA 02132  
508-580-7463 - work 617-  
327-3789 - home
9. Deidre Smith  
22 Meadow Lane  
Bridgewater, MA 02324  
508-580-7431 - work 508-  
697-6320 - home
10. Deborah Feldman  
145 Cliffwood Lane  
W. Falmouth, MA 02574  
508-580-7406 - work
11. Jane Malatesta  
29 Slocum Road  
Jamaica Plain, MA 02130  
617-524-3240 - home
12. Maria LeFort 2  
Laurel Hill Court  
Bourne, MA 02532

508-894-4536 - home

13. Thomas Malinowski  
c/o Brockton Education Association  
410 Forest Avenue  
Brockton, MA 02301
14. Alan Jolly  
47 Barden Hill Road  
Middleboro, MA 02346  
508-580-7431 - work  
508-947-8834 - home
15. Jean Ryan  
97 Boylston Street  
Brockton, MA 02301  
508-894-4400 - work  
508-587-1298
16. Eugene Marrow 128  
Healy Terrace  
Brockton, MA 02301  
508-584-0726
17. Sharon Wolder  
132 Coventry Circle  
Brockton, MA 02301  
508-584-3977
18. Laura Miceli  
8 Richfield Street  
Quincy, MA 02171  
617-571-3478
19. Barbara Sousa 220  
Myricks Street East  
Taunton, MA 02718

#### **EXHIBITS**

1. March 1, 2004 Job Posting for two open Housemaster Positions at Brockton High School

2. Brockton Schools Job Description of Housemaster
3. List of applicants for 2004 Housemaster
4. Document entitled "Review of Applicants for Administrative Positions" (list of individuals chosen for housemaster interviews)
5. Rejection Letters to 1<sup>st</sup> Group of Applicants
6. March 12, 2004 cover letter from Nancy Buckley.
7. 2004 Personnel File of Nancy Buckley
8. Nancy Buckley's 2004 Application for Housemaster
9. 2004 Resume of Nancy Buckley
10. Nancy Buckley's Department of Education Educator's Licenses/Certifications as of 2004 application for housemaster
11. Sept 4, 1986 - Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Assistant Principal at North Junior High School
12. Aug 3, 1988 - Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Assistant Principal at South Junior High School
13. May 30, 1991 - Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Principal at North Junior High School
14. Aug 29, 1991 - Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Assistant Principal at North Junior High School
15. May 27, 1992 - Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Assistant Housemaster at Brockton High School
16. Aug. 30, 1994 - Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Assistant Principal at West Junior High School
17. July 3, 2003 - Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Housemaster at Brockton High School
18. May 20, 2003 (should read 2004) - Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Housemaster at Brockton High School

19. March 12, 2004 Cover letter from Alan Jolly
20. Alan Jolly's 2004 Application for Housemaster
21. 2004 Personnel File of Alan Jolly
22. 2004 Resume of Alan Jolly
23. Alan Jolly's Department of Education Educator's Licenses/Certifications as of 2004 application for housemaster
24. Document entitled "Interview Team"
25. Disclosure Statement (Confidentially Statement) signed by Advisory Committee
26. John Whiton's Advisory Committee Materials from May 2004 Housemaster Interviews:
  - a. Interview Rating Sheets front & back
  - b. Document entitled "Questions for Applicants"
  - c. Document entitled "Interviews" (list of applicant names & times)
27. Deirdre Smith's Advisory Committee Materials from May 2004 Housemaster Interviews:
  - a. Interview Rating Sheets front & back
  - b. Document entitled "Questions for Applicants"
  - c. Document entitled "Interviews" (list of applicant names & times)
28. Maria LeFort's Advisory Committee Materials from May 2004 Housemaster Interviews:
  - a. Interview Rating Sheets front & back
  - b. Document entitled "Questions for Applicants"
  - c. Document entitled "Interviews" (list of applicant names & times)
29. Jane Malatesta's Advisory Committee Materials from May 2004 Housemaster Interviews:
  - a. Interview Rating Sheets front & back
  - b. Document entitled "Questions for Applicants"
  - c. Document entitled "Interviews" (list of applicant names & times)
30. Deborah Feldman's Advisory Committee Materials from May 2004 Housemaster Interviews:
  - a. Interview Rating Sheets front & back
  - b. Document entitled "Questions for Applicants"
  - c. Document entitled "Interviews" (list of applicant names & times)

31. Kathleen Sirois' Advisory Committee Materials from May 2004 Housemaster Interviews:
  - a. Interview Rating Sheets front & back
  - b. Document entitled "Questions for Applicants"
  - c. Document entitled "Interviews" (list of applicant names & times)
32. May 6 2004 Letter to Joseph Bage from Kathleen Sirois describing preliminary outcome of housemaster interviews.
33. May 20, 2003 (sic) letter to plaintiff regarding May 2004 housemaster position
34. Announcement letter (5/21/2004) of the promotion of Alan Jolly and Sharon Wolder to Housemaster.
35. Brockton Public School Committee Policy Manual: Personnel Section (G).

The Plaintiff reserves the right to supplement this list.

The Plaintiff,  
By her Attorney,

/s/ Kevin G. Powers  
Kevin G. Powers BBO#405020  
Rodgers, Powers & Schwartz LLP  
18 Tremont Street, Suite 500  
Boston, MA 02108  
617-742-7010

Buckley/Plaintiff.PreTrial Witness and Exhibit List